

EXHIBIT C

Redacted

Bowman, Andrew M.

From: Rex Lee <rexlee@quinnemanuel.com>
Sent: Thursday, August 5, 2021 11:33 AM
To: Bowman, Andrew M.; Sexton, Scott
Cc: Erika Morabito
Subject: RE: LeClairRyan, PLLC
Attachments: Confidential - Draft Amended Complaint.pdf

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Scott, Andrew,

Subject to your agreement on confidentiality, I attach our latest working draft of the proposed Amended Complaint. We do not anticipate any further material changes that would impact the causes of action asserted against [REDACTED]. We do, however, anticipate other cleanup items prior to filing, but are sending this to you now in the interest of time. As I indicated below, please advise if your client will consent (or not) to the Amended Complaint. Please respond by no later than 4 pm Eastern so that we may advise the Court either way in our motion that will accompany this filing. The arguments you raise in your letter can otherwise be addressed by the Court at the appropriate time.

Regards,
Rex Lee
Of Counsel
Quinn Emanuel Urquhart & Sullivan, LLP

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New York, NY 10010
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From: Bowman, Andrew M. [mailto:Bowman@gentrylocke.com]
Sent: Thursday, August 5, 2021 11:15 AM
To: Rex Lee <rexlee@quinnemanuel.com>; Sexton, Scott <sexton@gentrylocke.com>
Cc: Erika Morabito <erikamorabito@quinnemanuel.com>
Subject: RE: LeClairRyan, PLLC

[EXTERNAL EMAIL from bowman@gentrylocke.com]

Rex:

Please see the attached.

Thank you,

Andrew



web | bio | map
Andrew M. Bowman
Direct: 540.983.9404

This email may contain confidential or privileged information. If you are not the intended recipient, please advise by return email and delete immediately without reading/forwarding to others.

From: Rex Lee <rexlee@quinnemanuel.com>
Sent: Wednesday, August 4, 2021 4:55 PM
To: Sexton, Scott <sexton@gentrylocke.com>
Cc: Bowman, Andrew M. <Bowman@gentrylocke.com>; Erika Morabito <erikamorabito@quinnemanuel.com>
Subject: LeClairRyan, PLLC

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Scott:

As a professional courtesy, we are writing to inform you of two pleadings in relation to [REDACTED] that the Trustee intends to file tomorrow so that they can be heard at the August 19 omnibus hearing. First, the Trustee plans to seek leave to amend the Trustee's complaint in the adversary proceeding with ULX to, among other things, add [REDACTED] as a defendant in that case. Although your client has elected mediation under the FAO procedures order, his direct role in the events of the ULX case and the overlapping nature of the claims against him, along with other considerations, makes his addition to that proceeding the most efficient and appropriate course of action. In that respect, the Trustee also intends to file a motion to amend the FAO procedures to, among other things, permit the addition of [REDACTED] to the pending adversary proceeding. Notwithstanding this, she remains, of course, open to resolving the claims with [REDACTED] in mediation or otherwise. And to the extent agreement can be reached with [REDACTED], he would of course be removed as a defendant to that pending litigation.

We are prepared to send you a copy of the proposed Amended Complaint by no later than tomorrow morning, and request that you advise whether your client will consent to the amendment by no later than 12:00 PM ET. Before we provide a copy of the proposed Amended Complaint, however, please confirm that you and your client will treat the papers as "Confidential" as that term is defined in the Stipulated Protective Order Regarding the Disclosure and Use of Confidential Information (*Tavener v. ULX Partners, LLC*, Adv. Proc. No. 20-03142-KRH, ECF No. 48), as we intend to file the proposed Amended Complaint under seal.

Regards,
Rex Lee
Of Counsel
Quinn Emanuel Urquhart & Sullivan, LLP

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